

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

DAVID ALLEN HAVERKAMP, ALSO	§	
KNOWN AS BOBBIE LEE	§	
HAVERKAMP,	§	
	§	
<i>Plaintiff,</i>	§	CIVIL ACTION 2:17-cv-00018
	§	
v.	§	
	§	
JOHN AND JANE DOES, ET AL.	§	
	§	
<i>Defendants.</i>	§	

**UNOPPOSED SECOND MOTION TO EXTEND THE DEADLINE  
TO RESPOND TO THE SECOND AMENDED COMPLAINT**

Defendants Philip Keiser M.D., Dr. Jeffrey Beeson, Dr. John Burruss, Dr. Robert Greenberg, Preston Johnson, Jr., Dr. Cynthia Jumper, Dr. Owen Murray and Dr. Lannette Linthicum file this Unopposed Second Motion to Extend the Deadline to respond to Plaintiff's Second Amended Complaint. Defendants request an extension of the filing deadline to **July 11, 2022.**

Good cause exists for the deadline extension. This is the second request for an extension by Defendants. The extension is sought to provide additional time for the Attorney General, the State agencies and private counsel to coordinate a joint response among all of the Defendants.

The extension is not sought for delay only, but so that justice may be done.

Respectfully submitted,

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LANETTE LINTHICUM, M.D.

**CERTIFICATE OF WORD COUNT**

Pursuant to Court Procedure 16(c), I certify that this motion contains 114 words.

**CERTIFICATE OF CONFERENCE**

On June 9, 2022, I conferred by with counsel of record for Plaintiff. Plaintiff is not opposed to the extension.

/s/ John R. Strawn Jr.

John R. Strawn Jr.

**CERTIFICATE OF SERVICE**

I certify that on June 10, 2022 a true and correct copy of this document properly was served on counsel of record via electronic filing in accordance with the Southern District of Texas Procedures for Electronic filing.

/s/ John R. Strawn Jr.

John R. Strawn Jr.